



*The Repair Division
Repair Station EZ2R812K*

QUALITY ASSURANCE DEPT.
ROBERT J. POOLE
918-234-6860, Fax-6618
E-MAIL robertp@nordam.com

November 6, 2000

The NORDAM Repair Division is a part 145 certificated repair station, number EZ2R812K. As solicited by the FAA the NORDAM Repair Division chooses to comment on 14 CFR Part 121 Service Difficulty Reports, final rule.

The FAA is soliciting comments to (i) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility. (ii) Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information. (iii) Enhance the quality, utility, and clarity of the information collected. (iv) To minimize the burden of the collection of information on those who are to respond.

- (i) It is the opinion of this repair station that the agency better utilize the information currently collected in a practical manner for proper performance and that the changes to the rule are not necessary. The stated purpose for the change to the current rule is to provide the FAA with airworthiness statistical data necessary for planning, directing, controlling and evaluating certain assigned safety-related programs. Further the SDR's objective is to achieve prompt and appropriate correction of conditions adversely affecting continued airworthiness of aeronautical products. Yet, the information being requested is already reported to the FAA under several existing programs. For instance, the reporting of corrosion is required by many existing Airworthiness Directives, making the SDR report redundant. The reporting of approved repairs not contained in the manufacturer's manuals is likewise reported through the use of DERs submitting the FAA Form 8110-3 to the Aircraft Certification Service. Therefore, the additional reporting requirements are not required for the proper function of the agency.
- (ii) The accuracy of the agency's estimation in regards to the burden of the proposed collection of information imposed on this industry is grossly underestimated at the given estimate of three percent. The final rule will permit part 121, 125, and 135 certificate holders to "authorize" a repair station to submit an SDR on their behalf. The part 121, 125, and 135 certificate holders will "mandate" this reporting along with a majority of the associated cost to the repair stations, thus increasing our reporting cost by 70%. This repair station performs many repairs that have been approved by DERs or by the type certificate holder that are not contained in the manufacturer's maintenance manual. These repairs are required to be reported under the changed rule. We

anticipate that it will take 10-15 minutes per report. We will be unable to complete most of the information required to be reported by the regulation and therefore the SDR will be considered "open". The air carrier will then have to supplement the information. This will require additional time and expense for the air carrier.

- (iii) The quality, utility and clarity of the information collected will not be realized as expected by the agency. Currently it is very difficult to obtain the required work instructions from part 121, 125, and 135 certificate holders; not including the requirements of 121.704 (d) (1) through (9). The SDRs submitted by the repair stations will constantly be incomplete (original open) reports that will require the filing of (supplemental open) reports until the SDR can be closed (supplemental closed). Also the certificate holders will have to establish procedures and a system for the tracking of open SDRs.
- (iv) With regards to the magnitude of information and the format requirements this repair station realizes that the only minimization of burden is directed towards the agency. According to the Office of Management and Budget (OMB) sixteen of the section changes will increase cost; the changes in fifteen of them will add additional reporting requirements for information that has not been collected before or collected through voluntary reporting.

According to 14 CFR part 121 sections 121.703 (g), 121.704 (f), part 125 sections 125.409 (g), 125.410 9f), and part 135 sections 135.415(g), 135.416 (f) will permit part 121, 125, and 135 certificate holders to authorize a part 145 certificate holder to submit an SDR on their behalf. However the part 121, 125, and 135 certificate holder remains primarily responsible for ensuring compliance. How does this requirement reduce redundancies, decrease the number of reports, and establish faster reporting time? The agency should improve their use of data currently provided by existing programs such as aging aircraft and the RII programs.

Sections 121.704 (a), 125.410 (a), and 135.416 (a) all require each certificate holder shall report the occurrence or detection of each failure or defect related to:

- (1) The NORDAM Repair Division is opposed to reporting defects when an affected part has been replaced on the basis of not knowing when the part 121, 125, and 135 certificate holder has replaced a part on the aircraft.
- (2) The NORDAM Repair Division is opposed to reporting defects when a majority of the parts received from a part 121, 125, and 135 certificate holder exceed the OEM established allowable limits.
- (3) The NORDAM Repair Division is opposed to reporting defects when an affected part is designated as a primary or principal structure, a majority of part 121, 125, and 135 certificate holders modify this designation making it difficult to report accordingly.
- (4) The NORDAM Repair Division is opposed to reporting defects when a repair scheme for a part is not contained in the original equipment manufacture (OEM) manual. Also the NORDAM Repair Division is opposed to reporting defects when a repair scheme for a part is contained in the OEM manual and the limits are exceeded through a developed repair scheme approved by the FAA. Repetitive reporting of the same type of defect that is

repairable through a FAA approved expanded repair scheme does not add value overloading an already strained system.

- (4) (b) The NORDAM Repair Division is opposed to the ambiguity of the wording. Is the rule repeating its self or pertaining to additional defects discovered on detail-parts of the defective part.
- (4) (d) The NORDAM Repair Division is opposed to this section where as the only information we could consistently report is (5), (8), and (9) depending on the part 121, 125, and 135 certificate holders for the balance of the required information.

The NORDAM Repair Division is in agreement with Delta airlines that this rule should include Public Aircraft; if not than the FAA should encourage and not regulate the part 121, 125, and 135 certificate holders to comply with this program.

The NORDAM Repair Division is opposed to 14 CFR Part 121 Service Difficulty Reports, final rule in respect to the Paperwork Reduction Act of 1995. Currently repair stations are notifying the part 121, 125, and 135 certificate holders of a possible SDR. Therefor this rule cannot eliminate dual reporting. However with repair stations submitting original open reports and then additional supplemental open reports to the administrator this system will only quadruple the amount of required reporting.

Robert J. Poole
Quality Engineer